the first four weeks of the revised coordinated hot cut process.[22] AT&T April 28 Joint Affidavit, ¶¶ 141-44, Att. 2; Exhs. 8E, 8E Confidential. Indeed, AT&T's evidence has consistently shown provisioning error rates of 10-20% during the five months since commencement of the new provisioning process in March. BA-NY has never once provisioned hot cuts at a commercially acceptable level for even one week.

Failure to check for dial tone at DD-2 also causes BA-NY routinely to fail to provision loops served on Integrated Digital Loop Carrier within the prescribed interval.[23] AT&T data show numerous and persistent late IDLC notices from BA-NY that cause the provisioning to be delayed. AT&T has also fully documented customer loss of service caused by BA-NY's IDLC provisioning errors. BA-NY's inability to provision IDLC correctly is a failure to meet the express PFS commitment that "[a] change [from IDLC] to other existing plant to provide this CLEC service [the provisioning of a UNE loop] will have no impact on the Public Service Commission-established interval." PFS at 26.[24]

Not only does BA-NY fail to provision loops correctly, but it also consistently and deliberately misreports its own performance. BA-NY recanted all of its hot cut performance claims for the period prior to June 21. Currently, however, its reported performance data are just as biased and inaccurate as the disavowed pre-June 21 claims. First, BA-NY's "on-time" performance claims in its July 1 and July 23 affidavits still take no account of whether the hot cut was provisioned accurately or resulted in a customer outage. Tr. 3964 (Maguire). Second, the reconciliation process conducted during the July 27-30 Technical Conference made clear that BA-NY can easily massage the performance data as a result of the wide discretion BA-NY has in classifying individual hot cut situations, particularly in the treatment of

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called for the test to be conducted on DD minus one. Tr. 3983-91 (Rosenzweig); Exhs. 10, 11.

22 Indeed, in this proceeding, AT&T and BA-NY agree that the standard for determining a successful coordinated hot cut should be the customer experience and whether the cutover transferred the customer without service interruption. Tr. 3966 (Maguire); BA-NY April Joint Aff., ¶ 148. Yet, BA-NY has unabashedly sought to avoid the Commission's considered evaluation based upon that logical marketplace standard.

23 It warrants emphasis that IDLC identification should occur earlier during BA-NY's assignment (e.g., check for facilities availability) phase of the provisioning process.

24 BA-NY has been tacitly vying for a waiver of this commitment when it has argued that IDLC loops are "only" 9% of the local loops in the state. Nine percent is still 1,000,000 local loops. Equally important, IDLC loops are overwhelmingly used by business customers, and they make up approximately 20% of business customer loops.

rescheduled "supps." Many hot cut orders that were "supped" to a later date as a result of BA-NY's failure to follow the hot cut process (e.g., failure to conduct DD-2 dialtone testing) were not classified by BA-NY as a "miss" for reporting purposes, but rather as a "customer not ready" situation that would not be reflected as a "miss" in the metrics.

A combination of bad reporting systems, unsustainable interpretations of the metric reporting requirements and a disquieting disregard for the facts known to its own most knowledgeable employees produces reports that lack all credibility. Yet, astonishingly, BA-NY's own grossly overstated C2C performance data demonstrate that BA-NY is still not meeting its statutory obligations with respect to the ordering process for UNEs. BA-NY's own performance data from April through June 1999 show that it has failed to meet the absolute standards for UNE POTS order confirmation timeliness, and that its otherwise subpar performance has declined steadily since April.[25] In addition, although BA-NY claims that it is provisioning loops in a timely and quality manner, its performance results belie this assertion. From April through June 1999, the average delay days for missed UNE POTS orders were consistently higher for CLECs than for BA-NY's retail customers; and BA-NY's z-scores ranged from –2.88 to –5.86.[26] See Att. C (listing examples of metrics from April-June C2C reports showing out-of-parity conditions, including PR-4-02 (UNE)).[27]

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[25] See Attach. B (listing metrics from BA-NY's April – June C2C reports showing BA-NY's failure to meet absolute standards, including BA-NY's failure to meet the 95% standard for on time UNE LSRCs >=10 lines and BA-NY's declining LSRC timeliness performance from 89.47% in April to 85.41% in May to 82.88% in June (OR-1-06)).

[26] BA-NY's poor performance with respect to loops is not confined to provisioning. In May and June, a greater percentage of network troubles reported by CLECs were out of service for longer than 12 hours than those reported by BA-NY's retail customers; and BA-NY's z-scores for those months were -6.04 and -4.88, respectively. Id., MR-4-07.

[27] BA-NY cannot take comfort from KPMG's report on the coordinated hot cut process. The closure of Exception 54 was one of the instances where KPMG simply stopped testing and did not conclude that the problems had been satisfactorily resolved. Tr. 3870 (Weeks). Moreover, the due date minus 2 testing was determined to be beyond the scope of the retest, Tr. 3863 (McDonald), but KPMG still reported that BA-NY was not following this agreed-upon procedure: "BA-NY is not strictly following its timeline for pre-wire and coordinated provisioning activities up to two days before frame due time. KPMG believes that if these timelines are not followed strictly, trouble-shooting efforts can be hindered and potential provisioning problems can result." KPMG August Report Test Cross Reference P3-22. In its retest of frame due time activities, all KPMG determined was that BA-NY when under observation by KPMG personnel as part of a test would generally follow the established procedures. It is hardly surprising that BA-NY's errors increased the week after KPMG left the scene. See Exh. 8, 8A-8D, 8A Confidential-8D Confidential. KPMG also held BA-NY responsible for missed due dates 40% of the time including, specifically, when IDLC loops were not identified until the due date, further confirming that BA-NY has not met its PFS IDLC loop provisioning commitment.

AT&T and other carriers intend to use UNE-loops as their principal market entry strategy to provide service to small and medium-sized businesses in New York. Indeed, the CLEC industry was largely driven to this outcome by Commission policy restricting the availability of the UNE-Platform for certain categories of service and in certain critical geographic areas. The Commission was persuaded to adopt this policy in substantial part in reliance on BA-NY's sworn testimony that it could reliably provision hot cuts at commercial volumes. CLECs, including AT&T, accepted the Commission's challenge, investing hundreds of millions of dollars in switches and collocated cages. Now, BA-NY has wholly failed to meet its commitment.

IV. BA-NY HAS NOT PROVIDED NONDISCRIMINATORY ACCESS TO DIRECTORY ASSISTANCE AND DIRECTORY LISTINGS

A. AT&T's Data Show That More Than 10% of Orders to Migrate a Directory Listing "As Is" Upon Cutover of a UNE Loop Are Not Provisioned by BA-NY

BA-NY is losing far too many directory listings for UNE-L hot cut orders. At the Technical Conference, AT&T presented the results of a study it conducted to assess BA-NY's performance in provisioning directory listings associated with UNE LNP orders.[28] The study showed that 11 of the 103 orders -- almost 11 percent -- were not provisioned (i.e., the customer's directory listing had dropped out of the ATLAS database and could not be obtained from 411) as of three or more business days after loop cutover and remained unprovisioned for the duration of the study period.[29] Connolly/Callahan Aff. ¶ 7; Tr. 4146.

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[28] AT&T monitored 103 directory listing orders associated with coordinated hot-cut loops that were completed between July 1 and July 15, 1999. Each of these orders sought the migration "as is" of the customer's existing published BA-NY listing and therefore was placed, consistent with BA-NY's business rules, through a "Z" indicator on the loop order. Joint Supp. Aff. of T. Connolly & R. Callahan (July 27, 1999) ("Connolly/Callahan Aff."), ¶¶ 3, 6; Tr. 4143-44.

[29] In its August 3, 1999 Technical Conference Summary, BA-NY claims that AT&T's data concern "only 11 of 340 orders." (Id. at 4.) This assertion completely distorts the record. AT&T eliminated from its study those orders (whether properly provisioned or not) for which it had no BA-NY CSRs in order to ensure the accuracy of its data. This results-neutral scrubbing resulted in a smaller but more robust study base. If all orders had been included in the study, there would have been proportionately more failures. Indeed, AT&T also presented data on nine additional orders placed during the same period that were unprovisioned for a minimum of two weeks and completed only after escalation. Connolly/Callahan Aff. ¶¶ 8-9; Tr. 4150-53.

BA-NY has not rebutted any of these data, for which AT&T provided the underlying documentation prior to presenting its results.[30] BA-NY's performance in this area is completely unacceptable. Directory listings have a direct and significant effect on the small business customers that AT&T serves through UNE LNP. A rational business would think twice before risking migrating its service from BA-NY to AT&T if it knew that there was a material chance that it would lose its directory listing, for days or longer, after the change.[31] Dropped listings also impose substantial monitoring and escalation costs on CLECs. Tr. 4146-55.[32]

B. The Manual Changes and Software Modifications Implemented by BA-NY Do Not Prevent the Dropped Listings Identified by AT&T

In its Response to KPMG's Exception 56, BA-NY identified two sources of error in its provisioning of directory listings associated with UNE LNP orders: "human error" and "the sequence of the orders completed." BA-NY 7/7/99 Resp. to Exception 56 ("BA-NY Resp.") at 2.[33] Both of these sources of error result from the unsuitability of BA-NY's systems for operating in a wholesale environment. Human error occurs because directory listing orders -- even those seeking no change in the end-user's existing listing -- do not flow through, although they could if BA-NY did not have such difficulty provisioning the associated loop orders. Tr. 4024-25.

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30 See AT&T Confidential & Proprietary Documentation Relative to Testimony on Directory Listing Issues, filed with the Commission on July 27, 1999.

31 Moreover, if a customer is out of the directory listing database when the white or yellow pages goes to press, it will have no listing in the telephone book for an entire year. Tr. 4147-4148.

32 KPMG's closure of Exception No. 56 indicates that no further retesting would be conducted and did not report that KPMG was satisfied with the result. Indeed, the closure was in part premised on further testing being conducted by the Commission Staff. Moreover, KPMG did not actually retest BA-NY's systems by sending directory listing orders through its test bed accounts, but instead only reviewed BA-NY's work with respect to 39 CLEC orders and a sample of 89 CLEC listing orders tracked by the CLECs themselves. KPMG found three errors in the 39 audited orders (a 7.7% error rate), and CLECs reported 28 failures in the 89 CLEC orders (a 31.5% failure rate). KPMG discounted some of the CLEC-reported failures on the ground that the customer "was found to be correctly listed by KPMG" (Closure Rep. at 2), but an ex post check by KPMG does not prove that the listing had not at some earlier time been dropped. The most that can be concluded from the superficial review described in the Closure Report is thus that errors still occur at indeterminate levels. Likewise, the "interim accuracy" data shown in BA-NY's Response to Exception 56, which KPMG did not evaluate (Tr. 3917), confirm that errors continue to occur. The "% Accuracy (after final review)" figures show no more than that, to the extent BA-NY finds an error, it eventually fixes it after some undefined period of time. BA-NY Resp. at 5; see also Tr. 4032-35.

33 The order sequencing problem occurs because a "D" (Disconnect) order, required to release the customer's facilities, is sent downstream to the directory listing system. This removes the customer's listing data from the directory listing database. BA-NY Resp. at 3; Tr. 4016-17. If an "R" (Record) order, required to restore the listing to the database, precedes the "D" order in the listing system, the customer's listing will be removed from the database indefinitely. BA-NY Resp. at 3. BA-

To address these two sources of error, BA-NY claims to have implemented as of June 14, 1999 three categories of change: first, "refresher training" in the TISOC; second, "software modifications" to prevent improper order sequencing; and third, "manual checks" by two "quality assurance teams." BA-NY Resp. at 2-5. AT&T's data for July 1 through July 15 show, however, that these changes are ineffective to prevent a greater than 10% failure rate because they neither rectify the underlying limitations in BA-NY's systems nor audit results after the second day following completion. BA-NY's changes do not resolve the underlying causes of listing drop-outs because they are almost entirely manual, and as a result are reversible, unavoidably subject to human error, and difficult or impossible to scale to increased volumes of orders.[34] The modifications also fail to address the disappearance of directory listings from the database five to seven days after completion of the associated loop order, which is when AT&T data show dropped listings are most likely to occur. Tr. 4145. The last of BA-NY's "manual checks" occurs two days after completion. BA-NY has no procedures in place to identify or restore listings dropped after that date. Id. 4029-31. BA-NY's failure to catch the dropped listings identified by AT&T's study illustrates the inadequacy of BA-NY's "manual checks.

V. BA-NY FAILS TO PROVIDE PARITY ON UNE-P ORDERS

BA-NY does not provision the UNE-Platform ("UNE-P") in a commercially reasonable manner and at parity with BA-NY retail operations. This fact is confirmed by BA-NY's own performance reports, by the results of AT&T's carrier-to-carrier testing, and by KPMG's Final Report.

BA-NY's performance reports for the months of April, May, and June 1999 provide devastating and uncontradicted proof of BA-NY's failure to offer the UNE-Platform to CLECs at parity. During the second quarter of 1999, BA-NY completed orders for its retail customers in shorter intervals than BA-NY completed CLEC orders for UNE-P, resulting in z-scores that showed an extreme and certain lack of

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NY has not modified its systems so as to prevent the "D" order from reaching the listing system, although such a modification is possible and would eliminate the risk of a dropped listing. Tr. 4017-18.

[34] To prevent improper sequencing, a human being must enter no completion date in the appropriate field on the "R" order Tr. 3905-06, 3920, 4022-23. BA-NY has not considered eliminating this manual step through a software modification. Id. At 4023-26.

parity. See Att. C. BA-NY failed to provide UNE-P at parity in the crucial 1-to-5 line order segment, for dispatch orders. See id. During the second quarter of 1999, BA-NY offered average intervals to its retail customers that were shorter than the average intervals that BA-NY offered to CLECs ordering UNE-P, resulting in z-scores that again showed a lack of parity. See id. The lack of parity again impacted the 1-to-5 line order segment, for dispatch orders. See id.

AT&T's carrier-to-carrier testing data also show that BA-NY does not make UNE-P available in a commercially reasonable manner. See Supplemental Affidavit of Ray Crafton of August 16, 1999 ("Crafton August 16 Supp. Aff."). As with UNE-Loops, BA-NY's failure is fundamentally a failure of process. BA-NY does not consistently provide all electronic notifications necessary to manage a UNE-P order placed via the EDI interface.[35] See id. ¶¶ []. BA-NY routinely fails to provide all "life cycle elements" that are part of an order and almost always fails to provide the "life cycle elements" on time and in the proper sequence. See id. ¶¶ []. BA-NY routinely fails to return completion notices — a failure that severely impedes AT&T's ability to bill its retail and access customers — and its performance is getting worse, not better. See id. ¶¶ []. AT&T's testing shows further that BA-NY returns a steady stream of invalid and spurious EDI error messages on UNE-P orders — error messages that should not be returned because the orders are valid – and that these spurious error messages appear to be the consequence of systemic defects in BA-NY's systems rather than isolated problems. See id ¶¶ []. These spurious error messages result in significant provisioning delays for customers and hold AT&T UNE-P orders captive to BA-NY's unresponsive and backlogged Help Desk. See id. ¶¶ [].

Finally, KPMG confirmed that "BA-NY does not deliver service at parity." KPMG August Report, POP8, IV-221, IV-243. KPMG reached this conclusion after conducting extensive statistical tests of the provisioning metrics on completion and offer intervals and after considering the conceivable exogenous factors that could affect performance results. Id. This finding undercuts any BA-NY claim

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[35] As AT&T has shown in various submissions, critical EDI notifications are the acknowledgment, the local service request confirmation, the standard error message, and the completion notification. See, e.g., Crafton August 16 Supp. Aff., ¶¶ [ ]. In the context of mass commercial markets, it is essential that BA-NY provide these basic "life cycle elements" of an EDI order on time and in the proper sequence. See id.

that the lack of parity established by C2C performance results are attributable to differences in the mixes of BA-NY retail and CLEC orders. Together with the other record evidence, KPMG's finding shows irrefutably that BA-NY has not fulfilled its statutory obligations with respect to UNE-P.

VI. CHANGE CONTROL/DOCUMENTATION ISSUES STILL REMAIN

BA-NY's unacceptable OSS documentation, combined with its failure properly to manage change to its OSS interfaces, processes, and documentation, and its lack of stable and reliable test environments creates a "Bermuda Triangle" of interface development for CLECs. AT&T April 28 Joint Affidavit, ¶¶ 36-87; Tr. [cites].

BA-NY still does not provide CLECs with clear and complete documentation of its OSS interfaces and processes. Its OSS documentation continues to be riddled with an unacceptable number of errors and inconsistencies, and its documentation remains commercially unreasonable.[36] In particular, BA-NY has not corrected scores of errors and inconsistencies previously identified in its documentation, despite the year-long KPMG evaluation and the release of at least eleven different versions of EDI pre-order and order documentation during that period. Indeed, BA-NY's new releases exacerbate BA-NY's documentation problems by introducing substantial numbers of new errors and inconsistencies and re-incorporating many of the old. Tr. 2281-2283 (Connolly).

The poor quality of BA-NY's OSS documentation cannot seriously be disputed, as both KPMG and Hewlett Packard concluded that it was not of commercial quality and must be significantly improved. See KPMG August Report, pp. II-7, II-8; Hewlett Packard Final Report, p. []. Moreover, the most significant commercial users of BA-NY's Web/GUI and EDI pre-order and order interfaces independently confirmed the poor quality of BA-NY's documentation and the substantial barrier to local market entry that this poor documentation erects. Tr. __ (Crafton); 2284, 2302-2303 (Lichtenberg); 2300-2302 (Sivori); 2305-2306.

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[36] See Tr. 2281-2283 (Connolly); 2302 (Lichtenberg); AT&T April 28 Joint Aff. ¶¶ 37-45; AT&T Joint Affidavit of July 1, 1999 ("AT&T July 1 Joint Aff.") ¶¶ 9-14; KPMG Final Report, dated August 6, 1999, Executive Summary, pp. II-7, II-8

BA-NY also still fails to properly manage change to its OSS interfaces, processes, and documentation. BA-NY continues to rely almost exclusively on emergency "Flash Announcements" to notify CLECs of even routine changes, does not adhere to the Commission's advance notification intervals, and has not implemented a mechanism to prioritize CLEC-initiated changes at parity with changes that BA-NY itself initiates. Tr. []; AT&T April 28 Joint Aff. ¶¶ 46-33; AT&T July 1 Joint Aff., ¶¶ 15-21. Thus, it was completely appropriate for KPMG to refuse to close out Exception ID No. 6 relating to BA-NY's change management. See, KPMG Closure Report Exception ID No. 6.

BA-NY also still fails to provide reliable certification and new release test environments. Although BA-NY now offers "interim" Quality Assurance ("QA") test environments, KPMG reported only mixed results with the "interim" new release test environment, and had no opportunity at all to substantively evaluate the "interim" certification test environment. See KPMG Closure Report Exception ID No. 21; KPMG Closure Report Exception ID No. 22; Tr. []. See Exceptions ID Nos. 21 & 22. Moreover, actual CLEC experience with the "interim" QA environments has shown that they do not mirror the production environment, reconfirming a key deficiency documented earlier by KPMG. Tr. []; AT&T July 22 Aff., ¶¶ 13-14. Most significant, BA-NY plans to replace the "interim" QA environments in October 1999 with "permanent" QA environments that were never evaluated or tested by KPMG, the Commission or CLECs -- even though the permanent QA environments will rely on new hardware and new systems. Tr. []. Thus, it is impossible to conclude that the prior documented deficiencies found in BA-NY's test environments have been corrected.

VII. NDR/BILLING

BA-NY does not deliver UNE-P billing records to CLECs in accordance with requirements negotiated and agreed to in the Network Design Request ("NDR") process. Despite AT&T's extensive negotiation and documentation of its access and usage billing record requirements for AT&T's UNE-P, BA-NY delivered daily usage feed records to the wrong location (Mesa, Arizona rather than Kansas City, Missouri) in the wrong format (magnetic tape rather than Network Data Mover E electronic feed), and delivered access records in electronic feeds that mixed UNE-P data together with records for other

unrelated AT&T services. Tr. 2494-2495 (Crafton); AT&T July 22 Aff., ¶ 15. BA-NY conceded its errors on the record, offering no real excuse or explanation. Tr. 2421-2422 (Miller/McDermott).

Even after correction of its initial errors, BA-NY continues to deliver to AT&T billing records for UNE-P accounts that contain incorrect carrier codes, invalid billing account numbers, and inconsistent number portability surcharges that make it impossible for AT&T to correctly use and analyze billing information on the electronic basis that AT&T negotiated. July 22 Aff. ¶¶ 15-16. BA-NY has not rebutted these showings.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW YORK, INC.

Of Counsel:

Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006
(202) 736-8000

Harry M. Davidow
Robert D. Mulvee
Clifford K. Williams

Its Attorneys

32 Avenue of the Americas
Room 2700
New York, New York 10013
(212) 387-5605

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Attachment A

C2C METRICS THAT REMAIN UNDER DEVELOPMENT ACCORDING TO BA-NY'S JUNE C2C PERFORMANCE REPORT

1. UNE METRICS THAT REMAIN UNDER DEVELOPMENT

Complex Services-Electronically Submitted

OR-1-03 Average LSRC Time <10 Lines

OR-1-04 % On Time LSRC <10 Lines (Electronic)

OR-1-05 Average LSRC Time >=10 Lines

OR-1-06 % On Time LSRC >=10 Lines

OR-2-03 Average LSR Reject Time <10 Lines

OR-2-04 % On Time LSR Reject <10 Lines

OR-2-05 Average LSR Reject Time >=10 Lines

OR-2-06 % On Time LSR Reject >=10 Lines

Complex Services – FAX/Mail Submitted

OR-1-07 Av. LSRC Time <10 Lines Requiring Loop Qualification

OR-1-08 % On Time LSRC <10 Lines Requiring Loop Qualification

OR-1-09 Average LSRC Time >10 Lines Requiring Loop Qualification

OR-1-10 % On Time LSRC >=10 Lines Requiring Loop Qualification

OR-2-07 Average LSR Reject Time <10 Lines

OR-2-08 % On Time LSR Reject <10 Lines

OR-2-09 Average LSR Reject Time >=10 Lines

OR-2-10 % On Time LSR Reject >=10 Lines

UNE

POTS/Special Services - Aggregate

OR-6-01 % Accuracy – Orders

OR-6-02 % Accuracy – Opportunities

OR-6-04 % Accuracy LSRC (Long Term Measure)

Special Services – Electronically Submitted

OR-1-03 Average LSRC Time <10 Lines DSO

OR-1-03 Average LSRC Time <10 Lines DS1

OR-1-03 Average LSRC Time <10 Lines DS3

OR-1-04 % On Time LSRC <10 Lines DSO

OR-1-04 % On Time LSRC <10 Lines DS1

OR-1-04 % On Time LSRC <10 Lines DS3

OR-1-05 Average LSRC Time >=10 Lines DSO

OR-1-05 Average LSRC Time >=10 Lines DS1

OR-1-05 Average LSRC Time >=10 Lines DS3

OR-1-06 % On Time LSRC >=10 Lines DSO

OR-1-06 % On Time LSRC >=10 Lines DS1

OR-1-06 % On Time LSRC >=10 Lines DS3

Special Services – FAX/Mail Submitted

OR-1-07 Average LSRC Time <10 Lines DSO

OR-1-07 Average LSRC Time <10 Lines DS1

OR-1-07 Average LSRC Time <10 Lines (Fax)

OR-1-08 % On Time LSRC <10 Lines DSO

OR-1-08 % On Time LSRC <10 Lines DS1

OR-1-08 % On Time LSRC <10 Lines (Fax)

UNE

OR-1-09 Average LSRC Time >=10 Lines DSO

OR-1-09 Average LSRC Time >=10 Lines DS1

OR-1-09 Average LSRC Time >=10 Lines (Fax)

OR-1-10 % On Time LSRC >=10 Lines DSO

OR-1-10 % On Time LSRC >=10 Lines DS1

OR-1-10 % On Time LSRC >=10 Lines (Fax)

POTS

PR-4-08 % Missed Appt. – Customer – Due to Late Conf. – Hot Cut Loop

PR-4-08 % Missed Appt. – Customer – Due to Late Orders Confirmation (Other)

PR-4-08 % Missed Appt. – Customer – Due to Late Order Confirmation (Platform)

PR-6-02 % Installation Troubles Reported Within 7 Days – Hot Cut Loop (CLEC Aggregate)

POTS & Complex Aggregate

PR-1-10 Average Interval Offered – Disconnects – No Dispatch

PR-1-11 Average Interval Offered – Disconnects – Dispatch

PR-2-10 Average Completed Interval – Disconnects – No Dispatch

PR-2-11 Average Completed Interval – Disconnects – Dispatch

Complex Services

PR-4-08 % Missed App. Customer – Late Order Confirmation

Special Services – Provisioning

PR-1-09 Av. Interval Offered – Total (Trunks) – EEL

PR-1-10 Av. Interval Offered – Disconnects – No Dispatch

PR-1-11 Av. Interval Offered – Disconnects – Dispatch

PR-2-09 Av. Interval Completed – Total – EEL

PR-2-10 Av. Interval Completed – Disconnects – No Dispatch

PR-2-11 Av. Interval Completed – Disconnects – Dispatch

PR-4-02 Average Delay Days – Total – EEL

PR-4-03 % Missed App. – Customer – EEL

PR-4-08 % Missed Appt. Late Order Conf.

PR-7-01 % Orders With Jeopardy Status – EEL

Special Services – Provisioning 132

PR1-10 Av. Interval Offered – Disconnects – No Dispatch

PR-1-11 Av. Interval Offered – Disconnects – Dispatch

PR-2-09 Av. Interval Completed – Total – EEL

PR-2-10 Av. Interval Completed – Disconnects – No Dispatch

PR-4-01 % Missed Appt. – BA – Total - EEL

PR-4-01 % Missed Appt. – BA – Total – IOF

PR-4-02 Average Delay Days – Total - EEL

PR-4-03 % Missed Appt. – Customer – EEL

PR-4-08 % Missed Appt. – Customer – Late Order Conf.

PR-7-01 % Orders With Jeopardy Status – EEL

Special Services – Provisioning Non 132

PR-1-09 Av. Interval Offered – Total (Trunks) – EEL

PR-1-10 Av. Interval Offered –Disconnects – No Dispatch

PR-1-11 Av. Interval Offered – Disconnects – Dispatch

PR-2-09 Av. Interval Completed – Total – EEL

PR-2-10 Av. Interval Completed – Disconnects – No Dispatch

PR-2-11 Av. Interval Completed – Disconnects – Dispatch

PR-4-01 % Missed Appt. – BA – Total – EEL

PR-4-02 Average Delay Days – Total - EEL

PR-4-02 Average Delay Days – Total – EEL

PR-4-03 % Missed Appt. – Customer – EEL

PR-4-08 % Missed Appt. – Customer – Late Order Conf.

PR-7-01 % Orders With Jeopardy Status - EEL

2. TRUNK METRICS THAT REMAIN UNDER DEVELOPMENT

PR-2-09 Average Interval Completed – Total

PR-5-02 % Orders Held For Facilities >15 Days

PR-5-03 % Orders Held for Facilities >60 Days

PR-6-03 % Inst. Troubles Reported w/n 30 Days – FOK/TOK/CPE

3. RESALE METRICS THAT REMAIN UNDER DEVELOPMENT

Complex Services – Electronically Submitted

OR-1-03 Average LSRC Time <10 Lines

OR-1-04 % On Time LSRC <10 Lines

OR-1-05 Average LSRC Time >=10 Lines

OR-1-06 % On Time LSRC >=10 Lines

OR-2-03 Average LSR Reject Time <10 Lines

OR-2-04 % On Time LSR Reject <10 Lines

OR-2-05 Average LSR Reject Time >=10 Lines

OR-2-06 % On Time LSR Reject >=10 Lines

POTS/Special Services – Aggregate

OR-6-01 % Accuracy Orders

OR-6-02 % Accuracy – Opportunities

Special Services – Electronically Submitted

OR-1-03 Average LSRC Time <10 Lines DSO

OR-1-03 Average LSRC Time <10 Lines DS1

OR-1-03 Average LSRC Time <10 Lines DS3

OR-1-04 % On Time LSRC <10 Lines DSO

OR-1-04 % On Time LSRC <10 Lines DS1

OR-1-04 % On Time LSRC <10 Lines DS3

OR-1-05 Average LSRC Time >=10 Lines DSO

OR-1-05 Average LSRC Time >=10 Lines DS1

OR-1-05 Average LSRC Time >=10 Lines DS3

OR-1-06 % On Time LSRC >=10 Lines DSO

OR-1-06 % On Time LSRC >=10 Lines DS1

OR-1-06 % On Time LSRC >=10 Lines DS3

POTS

PR-4-08 % Missed Appt. – Customer – Late Order Conf. (CLEC)

POTS & Complex Aggregate

PR-1-10 Average Interval Offered – Disconnects – No Dispatch

PR-1-11 Average Interval Offered – Disconnects – Dispatch

PR-2-10 Average Interval Completed – Disconnects – No Dispatch

PR-2-11 Average Interval Completed – Disconnects – Dispatch

Complex Services

PR-4-08 % Missed Appt. – Customer – Late Order Conf. (CLEC)

Special Services

PR-1-10 Average Interval Offered – Disconnects – No Dispatch

PR-1-11 Average Interval Offered – Disconnects – Dispatch

PR-2-10 Average Interval Completed – Disconnects – No Dispatch

PR-2-11 Average Interval Completed – Disconnects – Dispatch

PR-4-08 % Missed Appt. – Customer – Due to Late Order Conf. (CLEC)

Special Services – Provisioning 132

PR-1-10 Average Interval Offered – Disconnects – No Dispatch

PR-1-11 Average Interval Offered – Disconnects – Dispatch

PR-2-10 Average Interval Completed – Disconnects – No Dispatch

PR-2-11 Average Interval Completed – Disconnects – Dispatch

PR-4-08 % Missed Appt. – Customer – Late Order Conf.

Special Services – Provisioning Non 132

PR-1-10 Average Interval Offered – Disconnects – No Dispatch (CLEC)

PR-1-11 Average Interval Offered – Disconnects – Dispatch (CLEC)

PR-2-10 Average Interval Completed – Disconnects – No Dispatch

PR-2-11 Average Interval Completed – Disconnects – Dispatch

PR-4-08 % Missed Appt. – Customer – Late Order Conf.

4. OSS METRICS THAT REMAIN UNDER DEVELOPMENT

PO-1-06 Facility Availability (Loop Qualification)

PO-1-07 Rejected Query

MR-1-05 Trouble Report History (by TN/Circuit) (BA-NY)

Attachment B

Examples of Metrics From BA-NY's C2C Reports Demonstrating BA-NY's Failure To Meet Absolute Standards

UNE

Month	Metric #	Metric	Standard[1]	Results
April	PO-3-04	% Ans. w/n 30 Seconds Repair	80% w/n 30 seconds	69.00
May	PO-3-04	% Ans. w/n 30 Seconds Repair	80% w/n 30 seconds	[Blank][2]
June	PO-3-04	% Ans. w/n 30 Seconds Repair	80% w/n 30 seconds	60.00

Month	Metric #	Metric	Standard	Results
April	OR-1-04 (UNE POTS)	% On Time LSRC <10 Lines (Electronic)	95% w/n 24 hrs.	72.08
May	OR-1-04 (UNE POTS)	% On Time LSRC <10 Lines (Electronic)	95% w/n 24 hrs.	66.87
June	OR-1-04 (UNE POTS)	% On Time LSRC <10 Lines (Electronic)	95% w/n 24 hrs.	80.15

Month	Metric #	Metric	Standard	Results
April	OR-1-06 (UNE POTS)	% On Time LSRC>=10 Lines (Electronic)	95% w/n 72 hrs.	89.47
May	OR-1-06 (UNE POTS)	% On Time LSRC >=10 Lines	95% w/n 72 hrs.	85.41
June	OR-1-06 (UNE POTS)	% On Time LSRC >=10 Lines	95% w/n 72 hrs.	82.88

Month	Metric #	Metric	Standard	Results
May	OR-2-02 (UNE POTS)	% On Time LSR Reject – Flow-Through	95% w/n 2 hrs.	92.03
June	OR-2-02 (UNE POTS)	% On Time LSR Reject – Flow-Through	95% w/n 2 hrs.	85.79

Month	Metric #	Metric	Standard	Results
April	OR-2-04 (UNE POTS)	% On Time LSR Reject <10 Lines (Electronic)	95% w/n 24 hrs.	77.23
May	OR-2-04 (UNE POTS)	% On Time LSR Reject <10 Lines	95% w/n 24 hrs.	62.51
June	OR-2-04 (UNE POTS)	% On Time LSR Reject <10 Lines	95% w/n 24 hrs.	71.32

[1] The column titled "standard" refers to those metrics where an absolute standard has been established under the C2C performance guidelines.

[2] BA-NY reported that its May data were unavailable due to ECD failure.

UNE (cont'd)

Month	Metric #	Metric	Standard	Results
May	OR-2-06	% On Time LSR Reject >=10 Lines	95% w/n 72 hrs.	92.50
June	OR-2-06 (UNE)	% On Time LSR Reject >=10 Lines	95% w/n 72 hrs.	90.69

Month	Metric #	Metric	Standard	Results
April	OR-1-04 (UNE Special Services – Electronically Submitted)	% On Time LSRC <10 Lines	95% w/n 48 hrs.	87.17
May	OR-1-04 (UNE Special Services – Electronically Submitted)	% On Time LSRC <10 Lines	95% w/n 48 hrs.	76.80
June	OR-1-04 (UNE Special Services – Electronically Submitted)	% On Time LSRC <10 Lines	95% w/n 48 hrs.	75.17

Month	Metric #	Metric	Standard	Results
May	OR-1-06 (UNE Special Services – Electronically Submitted)	% On Time LSRC >=10 Lines	95% w/n 72 hrs.	84.61
June	OR-1-06 (UNE Special Services – Electronically Submitted)	% On Time LSRC >=10 Lines	95% w/n 72 hrs.	85.71

Month	Metric #	Metric	Standard	Results
June	OR-2-04 (UNE Special Services – Electronically Submitted)	% On Time LSR Reject <10 Lines	95% w/n 48 hrs.	83.33

TRUNKS

Month	Metric #	Metric	Standard	Results
April	OR-1-12 (Trunks <=192 forecasted trunks)	% On Time FOC	95% on time w/n 10 bus. days	75.00
May	OR-1-12 (Trunks <=192 forecasted trunks)	% On Time FOC	95% on time w/n 10 bus. days	85.71
June	OR-1-12 (Trunks <=192 forecasted trunks)	% On Time FOC	95% on time w/n 10 bus. days	60.00

RESALE

Month	Metric #	Metric	Standard	Results
June	PO-3-04 Resale POTS	% Answered w/n 30 seconds – Repair	80% w/n 60 seconds	70.52

Month	Metric #	Metric	Standard	Results
June	OR-1-04 (POTS & Pre-Qualified – Electronically Submitted)	% On Time LSRC <10 Lines	95% w/n 24 hours	94.24

Month	Metric #	Metric	Standard	Results
June	OR-2-04 (Special Services – Electronically Submitted)	% On Time LSR Reject <10 Lines	95% w/n 48 hrs.	94.11

OPERATION SUPPORT SYSTEM

Month	Metric #	Metric	Standard	BA	CLEC	Difference
April	MR-1-01	Create Trouble	Parity plus <4 seconds	9.06	17.36	8.30
May	MR-1-01	Create Trouble	Parity plus <4 seconds	8.45	17.11	8.66
June	MR-1-01	Create Trouble	Parity plus <4 seconds	8.35	16.18	7.84

Attachment C

Metrics Showing Out-Of-Parity Condition from April-June C2C Reports[1]

RESALE

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-01	Resale POTS	% Completed in 1 Day (1-5 Lines – No Dispatch)	68.70	34.54	-40.57
May	PR-3-01	Resale POTS	% Completed in 1 Day (1-5 Lines – No Dispatch)	69.86	34.03	-42.94
June	PR-3-01	Resale POTS	% Completed in 1 Day (1-5 Lines – No Dispatch)	67.50	36.44	-32.20

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-02	Resale POTS	% Completed in 2 Days (1-5 Lines – No Dispatch)	81.10	59.46	-30.49
May	PR-3-02	Resale POTS	% Completed in 2 Days (1-5 Lines – No Dispatch)	83.77	58.47	-37.82
June	PR-3-02	Resale POTS	% Completed in 2 Days (1-5 Lines – No Dispatch)	82.59	66.76	-20.31

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-03	Resale POTS	% Completed in 3 Days (1-5 Lines – No Dispatch)	84.53	64.82	-30.09
May	PR-3-03	Resale POTS	% Completed in 3 Days (1-5 Lines – No Dispatch)	87.41	66.00	-35.61
June	PR-3-03	Resale POTS	% Completed in 3 Days (-15 Lines – No Dispatch)	86.16	77.20	-12.67

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-04	Resale POTS	% Completed in 1 Day (1-5 Lines – Dispatch)	21.12	6.13	-10.55
May	PR-3-04	Resale POTS	% Completed in 1 Day (1-5 Lines – Dispatch)	19.38	6.57	-9.05
June	PR-3-04	Resale POTS	% Completed in 1 Day (1-5 Lines – Dispatch	18.65	8.34	-7.52

[1] Source: BA-NY's Submission 2, C2C Reports April-June 1999.

RESALE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-05	Resale POTS	% Completed in 2 Days (1-5 Lines – Dispatch)	53.65	24.77	-16.56
May	PR-3-05	Resale POTS	% Completed in 2 Days (1-5 Lines – Dispatch)	49.62	21.53	-15.57
June	PR-3-05	Resale POTS	% Completed in 2 Days (1-5 Lines – Dispatch)	44.30	26.09	-10.34

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-06	Resale POTS	% Completed in 3 Days (1-5 Lines – Dispatch)	64.40	41.67	-13.59
May	PR-3-06	Resale POTS	% Completed in 3 Days (1-5 Lines – Dispatch)	62.68	45.50	-9.86
June	PR-3-06	Resale POTS	% Completed in 3 Days (1-5 Lines – Dispatch)	57.43	47.59	-5.61

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-07	Resale POTS	% Completed in 4 Days (1-5 Lines – Total)	91.77	88.74	-6.90
May	PR-3-07	Resale POTS	% Completed in 4 Days (1-5 Lines – Total)	92.19	87.77	-10.24
June	PR-3-07	Resale POTS	% Completed in 4 Days (1-5 Lines – Total)	91.43	87.43	-8.11

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-09	Resale POTS	% Completed in 5 Days (1-5 Lines – Dispatch)	83.86	75.81	-6.30
May	PR-3-09	Resale POTS	% Completed in 5 Days (1-5 Lines – Dispatch)	85.15	78.10	-5.55
June	PR-3-09	Resale POTS	% Completed in 5 Days (1-5 Lines – Dispatch)	83.04	80.85	-1.66

RESALE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-10	Resale POTS	% Completed in 6 Days (1-5 Lines – Total)	97.08	96.21	-3.24
May	PR-3-10	Resale POTS	% Completed in 6 Days (1-5 Lines – Total)	97.05	96.55	-1.84

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-4-02	Resale POTS	Average Delay Days	4.21	6.83	-4.33
May	PR-4-02	Resale POTS	Average Delay Days	3.77	4.94	-2.08
June	PR-4-02	Resale POTS	Average Delay Days	3.82	5.95	-3.74

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-01	Resale POTS – Business	Av. Interval Offered – Total – No Dispatch	1.55	1.93	-3.98
May	PR-1-01	Resale POTS – Business	Av. Interval Offered – Total – No Dispatch	1.69	2.16	-4.09
June	PR-1-01	Resale POTS – Business	Av. Interval Offered – Total – No Dispatch	1.35	2.11	-8.23

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-03	Resale POTS – Business	Av. Interval Offered – Dispatch (1-5 Lines)	2.75	3.80	-9.35
May	PR-1-03	Resale POTS – Business	Av. Interval Offered – Dispatch (1-5 Lines)	2.75	4.02	-8.41
June	PR-1-03	Resale POTS - Business	Av. Interval Offered – Dispatch (1-5 Lines)	2.81	3.85	-7.51

RESALE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-01	Resale POTS – Business	Average Interval Completed – Total – No Dispatch	1.62	1.83	-1.98
May	PR-2-01	Resale POTS – Business	Average Interval Completed – Total – No Dispatch	1.70	1.93	-2.40
June	PR-2-01	Resale POTS – Business	Average Interval Completed – Total – No Dispatch	1.25	1.72	-6.63

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-03	Resale POTS – Business	Av. Interval Completed – Dispatch (1-5 Lines)	3.20	4.39	-8.43
May	PR-2-03	Resale POTS – Business	Av. Interval Completed – Dispatch (1-5 Lines)	3.16	4.33	-8.38
June	PR-2-03	Resale POTS - Business	Av. Interval Completed – Dispatch (1-5 Lines)	3.27	4.16	-5.72

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-01	Resale POTS – Residence	Av. Interval Offered – Total – No Dispatch	0.96	2.40	-29.07
May	PR-1-01	Resale POTS – Residence	Av. Interval Offered – Total – No Dispatch	0.89	2.32	-30.64
June	PR-1-01	Resale POTS - Residence	Av. Interval Offered – Total – No Dispatch	0.98	2.34	-22.89

RESALE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-03	Resale POTS – Residence	Av. Interval Offered – Dispatch (1-5 Lines)	3.28	4.69	-9.57
May	PR-1-03	Resale POTS – Residence	Av. Interval Offered – Dispatch (1-5 Lines)	3.30	4.23	-5.20
June	PR-1-03	Resale POTS - Residence	Av. Interval Offered – Dispatch (1-5 Lines)	3.54	4.14	-3.39

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-01	Resale POTS – Residence	Av. Interval Completed – Total – No Dispatch	0.92	2.43	-39.78
May	PR-2-01	Resale POTS – Residence	Av. Interval Completed – Total – No Dispatch	0.86	2.32	-38.17
June	PR-2-01	Resale POTS - Residence	Av. Interval Completed – Total – No Dispatch	0.94	2.14	-28.27

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-03	Resale POTS – Residence	Av. Interval Completed – Dispatch (1-5 Lines)	3.53	4.82	-6.45
May	PR-2-03	Resale POTS – Residence	Av. Interval Completed – Dispatch (1-5 Lines)	3.59	4.45	-4.02
June	PR-2-03	Resale POTS - Residence	Av. Interval Completed – Dispatch (1-5 Lines)	3.93	4.48	-2.44

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-02	Resale/ Complex	Av. Interval Offered – Total – Dispatch	2.51	4.89	-2.33
June	PR-1-02	Resale/ Complex	Av. Interval Offered – Total – Dispatch	2.65	5.33	-2.47

RESALE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	PR-4-01	Resale/ Special Services	% Missed Appointments – Bell Atlantic - Total	0.67	2.20	-2.79

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	MR-4-03	Resale POTS	Mean Time to Repair – Central Office Trouble	9.12	10.73	-2.23

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	MR-2-01	Resale/ Special Services	Network Trouble Report Rate	0.92	1.89	-3.03
June	MR-2-01	Resale/ Special Services	Network Trouble Report Rate	0.94	3.94	-10.05

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
June	MR-4-06	Resale/ Special Services	% Out of Service >4 hours	59.53	78.05	-2.22

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	MR-2-01	Resale/ Special Services – Maintenance 132	Network Trouble Report Rate	1.01	2.93	-4.05
May	MR-2-01	Resale/ Special Services – Maintenance 132	Network Trouble Report Rate	1.09	2.78	-3.91
June	MR-2-01	Resale/ Special Services – Maintenance 132	Network Trouble Report Rate	1.10	5.96	-12.03

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	MR-2-01	Resale/ Special Services – Maintenance – Non 132	Network Trouble Report Rate	0.32	1.04	-2.19

RESALE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	PR-4-01	Resale/ Special Services Non 132	% Missed Appointment	0.48	3.33	-3.06

UNE

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-01	UNE POTS (Platform)	Av. Interval Offered – Total – No Dispatch – Platform	1.55	4.25	-49.53
May	PR-1-01	UNE POTS (Platform)	Av. Interval Offered – Total – No Dispatch – Platform	1.69	3.63	-29.66
June	PR-1-01	UNE POTS (Platform)	Av. Interval Offered – Total – No Dispatch – Platform	1.35	3.44	-38.93

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-03	UNE POTS	Av. Interval Offered – Dispatch (1-5 Lines) – Loop	2.75	4.75	-10.23
May	PR-1-03	UNE POTS	Av. Interval Offered – Dispatch (1-5 Lines) – Loop	2.75	5.31	-7.63
June	PR-1-03	UNE POTS	Av. Interval Offered – Dispatch (1-5 Lines) – Loop	2.81	5.60	-8.56

UNE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-03	UNE POTS (Platform)	Av. Interval Offered – Dispatch (1-5 Lines) – Platform	2.75	5.24	-16.30
May	PR-1-03	UNE POTS (Platform)	Av. Interval Offered – Dispatch (1-5 Lines) – Platform	2.75	4.77	-10.71

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-01	UNE POTS (Platform)	Av. Interval Completed – Total – No Dispatch – Platform	1.62	4.24	-43.53
May	PR-2-01	UNE POTS (Platform)	Av. Interval Completed – Total – No Dispatch – Platform	1.70	3.54	-33.87
June	PR-2-01	UNE POTS (Platform)	Av. Interval Completed – Total – No Dispatch – Platform	1.25	3.44	-53.40

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-03	UNE POTS	Av. Interval Completed – Dispatch (1-5 Lines) – Loop	3.20	5.09	-7.81
May	PR-2-03	UNE POTS	Av. Interval Completed – Dispatch (1-5 Lines) – Loop	3.16	5.11	-6.26
June	PR-2-03	UNE POTS	Av. Interval Completed – Dispatch (1-5 Lines) – Loop	3.27	6.55	-8.73

UNE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-03	UNE POTS (Platform)	Av. Completed Interval – Dispatch (1-5 Lines) – Platform	3.20	5.63	-12.37
May	PR-2-03	UNE POTS (Platform)	Av. Completed Interval – Dispatch (1-5 Lines) – Platform	3.16	5.21	-11.36

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-01	Platform & Other (Switch & INP)	% Completed in 1 Day (1-5 Lines) – No Dispatch	68.70	24.34	-94.16
May	PR-3-01	Platform & Other (Switch & INP)	% Completed in 1 Day (1-5 Lines) – No Dispatch	69.86	33.35	-81.32
June	PR-3-01	Platform & Other (Switch & INP)	% Completed in 1 Day (1-5 Lines) – No Dispatch	67.50	32.94	-65.96

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-02	Platform & Other (Switch & INP)	% Completed in 2 Days (1-5 Lines) – No Dispatch	81.10	35.72	-114.42
May	PR-3-02	Platform & Other (Switch & INP)	% Completed in 2 Days (1-5 Lines) – No Dispatch	83.77	42.42	-115.09
June	PR-3-02	Platform & Other (Switch & INP)	% Completed in 2 Days (1-5 Lines) – No Dispatch	82.59	39.02	-103.07

UNE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-03	Platform & Other (Switch & INP)	% Completed in 3 Days (1-5 Lines) – No Dispatch	84.53	42.06	-116.07
May	PR-3-03	Platform & Other (Switch & INP)	% Completed in 3 days (1-5 Lines) – No Dispatch	87.41	52.13	-109.33
June	PR-3-03	Platform & Other (Switch & INP)	% Completed in 3 Days (1-5 Lines) – No Dispatch	86.18	50.34	-93.28

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-04	Platform & Other (Switch & INP)	% Completed in 1 Day (1-5 Lines) – Dispatch	21.12	10.75	-4.19
May	PR-3-04	Platform & Other (Switch & INP)	% Completed in 1 Day (1-5 Lines) – Dispatch	19.38	11.31	-3.63

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-05	Platform & Other (Switch & INP)	% Completed in 2 Days (1-5 Lines) – Dispatch	53.65	14.34	-12.96
May	PR-3-05	Platform & Other (Switch & INP)	% Completed in 2 Days (1-5 Lines) – Dispatch	49.62	14.98	-12.26

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-06	Platform & Other (Switch & INP)	% Completed in 3 Days (1-5 Lines) – Dispatch	64.40	26.52	-13.01
May	PR-3-06	Platform & Other (Switch & INP)	% Completed in 3 Days (1-5 Lines) – Dispatch	62.86	34.86	-10.19

UNE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-07	Platform & Other (Switch & INP)	% Completed in 4 Days (1-5 Lines) – Total	91.77	54.17	-137.82
May	PR-3-07	Platform & Other (Switch & INP)	% Completed in 4 Days (1-5 Lines) – Total	92.19	67.06	-98.17
June	PR-3-07	Platform & Other (Switch & INP)	% Completed in 4 Days (1-5 Lines) - Total	91.43	72.57	-68.98

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-08	Platform & Other (Switch & INP)	% Completed in 5 Days (1-5 Lines) – No Dispatch	98.01	72.18	-184.45
May	PR-3-08	Platform & Other (Switch & INP)	% Completed in 5 Days (1-5 Lines) – No Dispatch	97.63	78.97	-127.16
June	PR-3-08	Platform & Other (Switch & INP)	% Completed in 5 Days (1-5 Lines) – No Dispatch	97.54	84.52	-76.05

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-09	Platform & Other (Switch & INP)	% Completed in 5 Days (1-5 Lines) – Dispatch	83.86	56.99	-12.06
May	PR-3-09	Platform & Other (Switch & INP)	% Completed in 5 Days (1-5 Lines) – Dispatch	85.15	67.89	-8.64

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-3-10	Platform & Other (Switch & INP)	% Completed in 6 Days (1-5 Lines) – Total	97.08	81.15	-95.65
May	PR-3-10	Platform & Other (Switch & INP)	% Completed in 6 Days (1-5 Lines) – Total	97.05	83.55	-83.97
June	PR-3-10	Platform & Other (Switch & INP)	% Completed in 6 Days (1-5 Lines) – Total	96.85	90.05	-40.02

UNE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-4-02	UNE POTS	Average Delay Days	4.21	6.82	-2.88
May	PR-4-02	UNE POTS	Average Delay Days	3.77	8.98	-5.86
June	PR-4-02	UNE POTS	Average Delay Days	3.82	7.56	-5.49

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-02	UNE Complex	Av. Interval Offered – Total – Dispatch	2.51	6.44	-15.33
May	PR-1-02	UNE Complex	Av. Interval Offered – Total – Dispatch	2.57	5.83	-11.47
June	PR-1-02	UNE Complex	Av. Interval Offered – Total – Dispatch	2.65	4.75	-9.35

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-02	UNE Complex	Av. Interval Completed – Total – Dispatch	3.29	5.37	-5.22
May	PR-2-02	UNE Complex	Av. Interval Completed – Total – Dispatch	3.41	5.00	-2.49
June	PR-2-02	UNE Complex	Av. Interval Completed – Total - Dispatch	3.45	4.95	-3.64

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-01	UNE Special Services	Av. Interval Offered – Total – No Dispatch	8.16	121.00	-6.60

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	PR-1-02	UNE Special Services	Av. Interval Offered – Total – Dispatch	12.91	29.90	-2.39
June	PR-1-02	UNE Special Services	Av. Interval Offered – Total – Dispatch	10.61	20.11	-3.21

UNE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-07	UNE Special Services	Av. Interval Offered – DS1	14.41	35.67	-2.03

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-07	UNE Special Services	Av. Interval Completed – DS1	21.43	56.67	-4.21
May	PR-2-07	UNE Special Services	Av. Interval Completed – DS1	21.34	30.46	-1.84

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	MR-2-03	UNE POTS	Network Trouble Report Rate – Central Office	0.15	0.18	-3.18
May	MR-2-03	UNE POTS	Network Trouble Report Rate – Central Office	0.14	0.21	-7.28
June	MR-2-03	UNE POTS	Network Trouble Report Rate – Central Office	0.16	0.19	-3.86

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	MR-3-01	UNE POTS	% Missed Repair Appt. – Loop	10.61	12.33	-2.12

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	MR-3-02	UNE POTS	% Missed Repair Appt. – Central Office	5.71	10.46	-4.03

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	MR-4-02	UNE POTS	Mean Time to Repair – Loop Trouble	24.13	26.25	-2.70

UNE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-4-03	UNE POTS	Mean Time to Repair – Central Office Trouble	9.12	13.40	-4.70
May	PR-4-03	UNE POTS	Mean Time to Repair – Central Office Trouble	10.25	12.30	-2.28

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	MR-4-07	UNE POTS	% Out of Service >12 hours	62.67	71.96	-6.04
June	MR-4-07	UNE POTS	% Out of Service > 12 hours	63.34	70.24	-4.88

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-01	UNE Special Services – Provisioning 132	Av. Interval Offered – Total – No Dispatch	8.37	121.00	-6.13

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	PR-1-02	UNE Special Services – Provisioning 132	Av. Interval Offered – Total – Dispatch	12.92	33.63	-2.47
June	PR-1-02	UNE Special Services – Provisioning 132	Av. Interval Offered – Total - Dispatch	10.72	21.72	-2.99

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-1-07	UNE Special Services – Provisioning 132	Av. Interval Offered – DS1	14.82	35.67	-1.83

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-01	UNE Special Services – Provisioning 132	Av. Interval Completed – Total – No Dispatch	12.35	121.00	-7.38

UNE (cont'd)

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
April	PR-2-07	UNE Special Services – Provisioning 132	Av. Interval Completed – DS1	20.67	56.67	-4.42
May	PR-2-07	UNE Special Services – Provisioning 132	Av. Interval Completed – DS1	21.44	33.45	-2.19

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
June	PR-1-02	UNE Special Services – Provisioning Non 132	Av. Interval Offered – Total - Dispatch	10.07	15.29	-2.19

TRUNKS

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
May	NP-1-02	Trunks	% FTG Exceeding Blocking Std. (No Exceptions)	3.06	6.86	-1.85

MONTH	METRIC #	PRODUCT	METRIC	BA	CLEC	Z-SCORE
June	PR-4-01	Trunks	% Missed Appointment – Bell Atlantic - Total	0.46	4.54	-43.78